Oregon
Theodore Kulongoski, Governor

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June 11, 2004

Ms. Anne Summers
Port of Portland
P.O. Box 3529
Portland, Oregon 97208

Re: No Further Action
Terminal 4 – Auto Storage Facility
10400 N. Lombard, Portland, Oregon
ECSI #172

Dear Ms. Summers:

The Oregon Department of Environmental Quality (DEQ) completed a review of the following documents for the above-referenced site:

- *Terminal 4 – Auto Storage Facility Preliminary Assessment*, Port of Portland, August 21, 2000
- *Baseline Environmental Site Assessment Phase I and II Investigation Report*, Hart Crowser, October 4, 2002
- *Groundwater Investigation*, Hart Crowser, May 14, 2002
- *Predevelopment Investigation,* Hart Crowser, December 18, 2003

The subject property is shown on Figures 1 and 2. The upper portion of the facility, identified on Figure 2 as Toyota Logistics Services, Inc., is not part of the subject property and is under separate investigation (DEQ LUST #26-91-0133). DEQ requested that the Port of Portland (Port) evaluate the subject site's potential impact to the Willamette River as part of upland investigations in Portland Harbor. The work described in the reports was based on DEQ's recommendations outlined in a letter and e-mail to the Port on September 4, 2001 and October 17, 2001, respectively.

DEQ determined that no further action is required to address environmental contamination at the Terminal 4 – Auto Storage Facility property. This determination is based on the regulations and facts as we now understand them, including but not limited to the following:

1. The Port purchased undeveloped land in 1917 for Terminal 4 and until 1920 used dredged material to create the slips. Until the early 1960s, the facility was used for bulk loading of coke, iron ore, phosphate rock, manganese, sulfur, bentonite clay, talc, and soda ash. From 1942 to 1946, the U.S. government took over Terminal 4 during World War II for embarkation. Between 1957 and 1969, the Port purchased additional property

and used dredged material to fill the uplands and submerged land; the source of the dredged material is unknown. From the early 1970's to the present, the facility has been used primarily for receiving automobiles from ships, with minor steel storage as well. Petroleum contamination (primarily polycyclic aromatic hydrocarbons (PAHs)) was observed in subsurface soil and groundwater in the site investigations conducted in April 2001 and February 2003. Site investigations indicated that residual contamination is below levels of concern.

2. Relatively low levels of metals and PAHs were detected in most of the soil samples without showing a pattern of a source area. Only four of 43 soil samples showed PAH concentrations that exceeded US EPA Region 9 Preliminary Remediation Goals (PRGs) for industrial sites. Considering the limited horizontal and vertical extent of the PAH-contaminated soil at those sample locations and the current and future industrial use of the property, it does not appear to pose a risk to human health. Arsenic was the only metal that exceeded PRGs, but observed concentrations were within background levels for this region.

3. Soil samples were collected in December 2001 to demonstrate that the riverbank stabilization and enhancement project at the subject site would not expose soil contaminants that could potentially erode into the Willamette River. Soil concentrations at the newly exposed surface are below protective levels for human health and the environment (PRGs and Ambient Water Quality Criteria/DEQ Ecological Screening Level Values, respectively).

4. The current and future beneficial use of groundwater at the site is discharge to the adjacent Willamette River. Four of the five grab groundwater samples collected in April 2001 from riverbank push probe borings contained elevated levels of PAHs. There was poor correlation between areas of soil and groundwater contamination, and a distinct source for the groundwater contamination was not identified. Potential discharge of groundwater contamination from the site to the Willamette River was further evaluated by installation and sampling of four riverbank monitoring wells in March 2002. PAHs were detected in only one well, and only one PAH constituent (benzo(a)anthracene) exceeded DEQ's ecological screening level. Due to the relatively low concentration of benzo(a)anthracene in the riverbank monitoring well and its likely attenuation by the time it migrates from the riverbank to Willamette River sediment/surface water, the low frequency of detection in the four wells, and the lack of a known contaminant source, site groundwater does not appear to pose a risk to ecological receptors in the river.

5. Significant soil excavation or groundwater extraction is not anticipated at the recently redeveloped auto storage facility. If soil is excavated in the future, the Port will prepare a soil management plan that describes the appropriate methods and procedures for handling and managing the soil. If dewatering is required during future excavation, site construction plans will be developed to limit contact with groundwater and treat pumped water prior to discharge.

6. Toyota Logistics Services, Inc. has an NPDES 1200-Z stormwater permit (# 100726). Four stormwater samples collected between October 2000 and April 2002 (the only data available) are in compliance with the permit requirements for pH, total suspended solids, oil and grease, copper, lead and zinc. Based on the current use of the site (i.e., asphalt cap) and the recently constructed stormwater management system (including bio-swales), there appears to be low potential for contaminant loading from site storm water to river sediment.

7. There appears to be significant sediment contamination adjacent to the site in the Willamette River (summarized in DEQ's letter dated September 4, 2001). However, the site does not appear to be a current source of contamination to the river via the pathways described above (surface soil erosion, stormwater, and groundwater).

DEQ concludes that based on the information presented to date, the Terminal 4 – Auto Storage Facility is currently protective of public health and the environment and requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available. We will update the Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

Please call me at 503-229-5326 if you have any questions.

Sincerely,

Tom Gainer

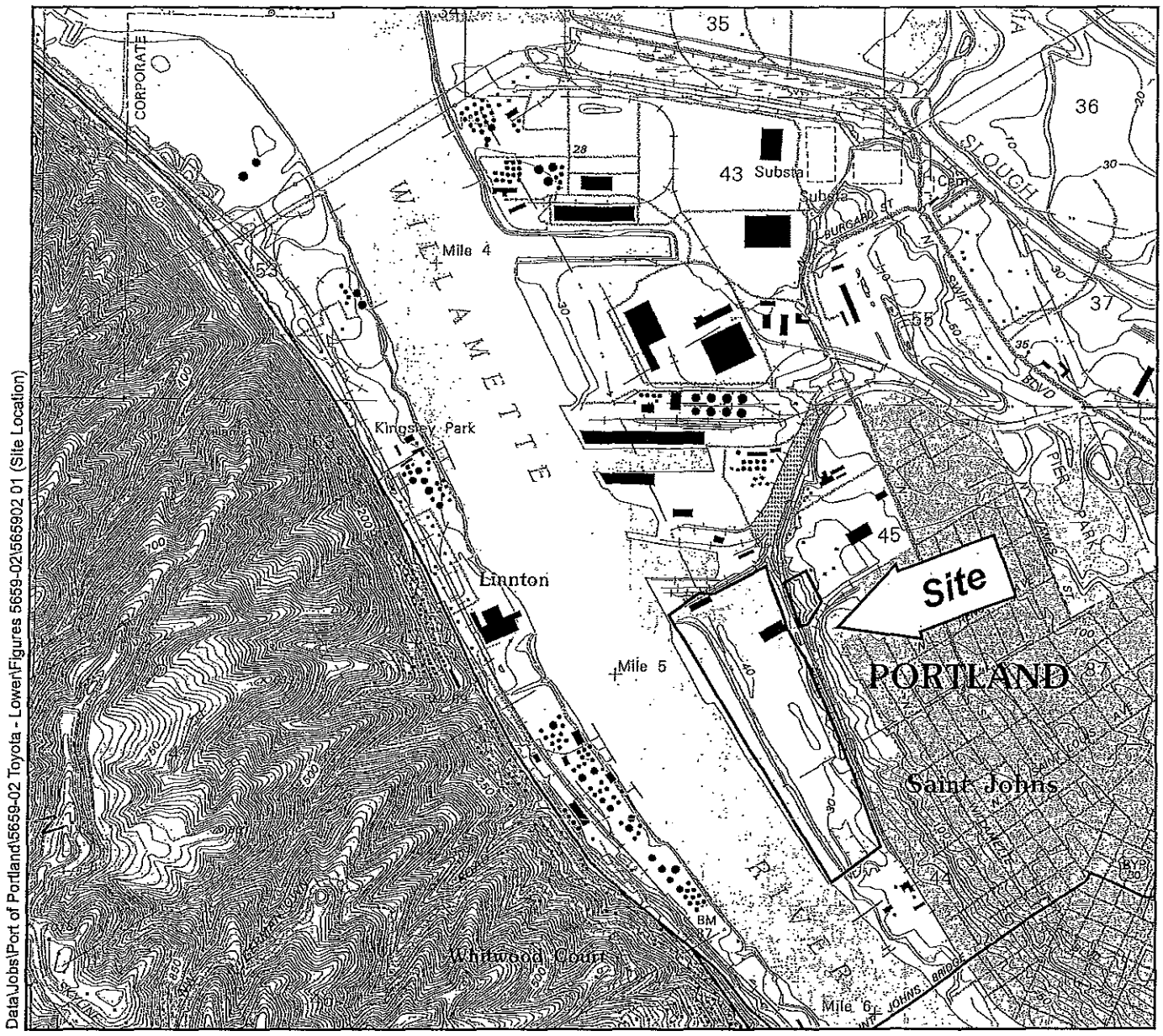
Tom Gainer, P.E.
Project Manager
Cleanup/Portland Harbor

Attachments: Figures 1 and 2

cc: Jim Anderson, DEQ/NWR
Henning Larsen, DEQ/NWR
Tara Martich, EPA/Seattle
Dawn Sanders, BES

Site Location Map

Toyota Logistics Services, Inc. - Lower Parcel
Port of Portland - Terminal 4, Portland, Oregon



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Note: Base map prepared from the USGS 7.5-minute quadrangle of Linnton, Oregon, dated 1990.

0 2,000 4,000

Scale in Feet
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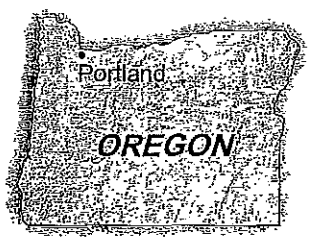

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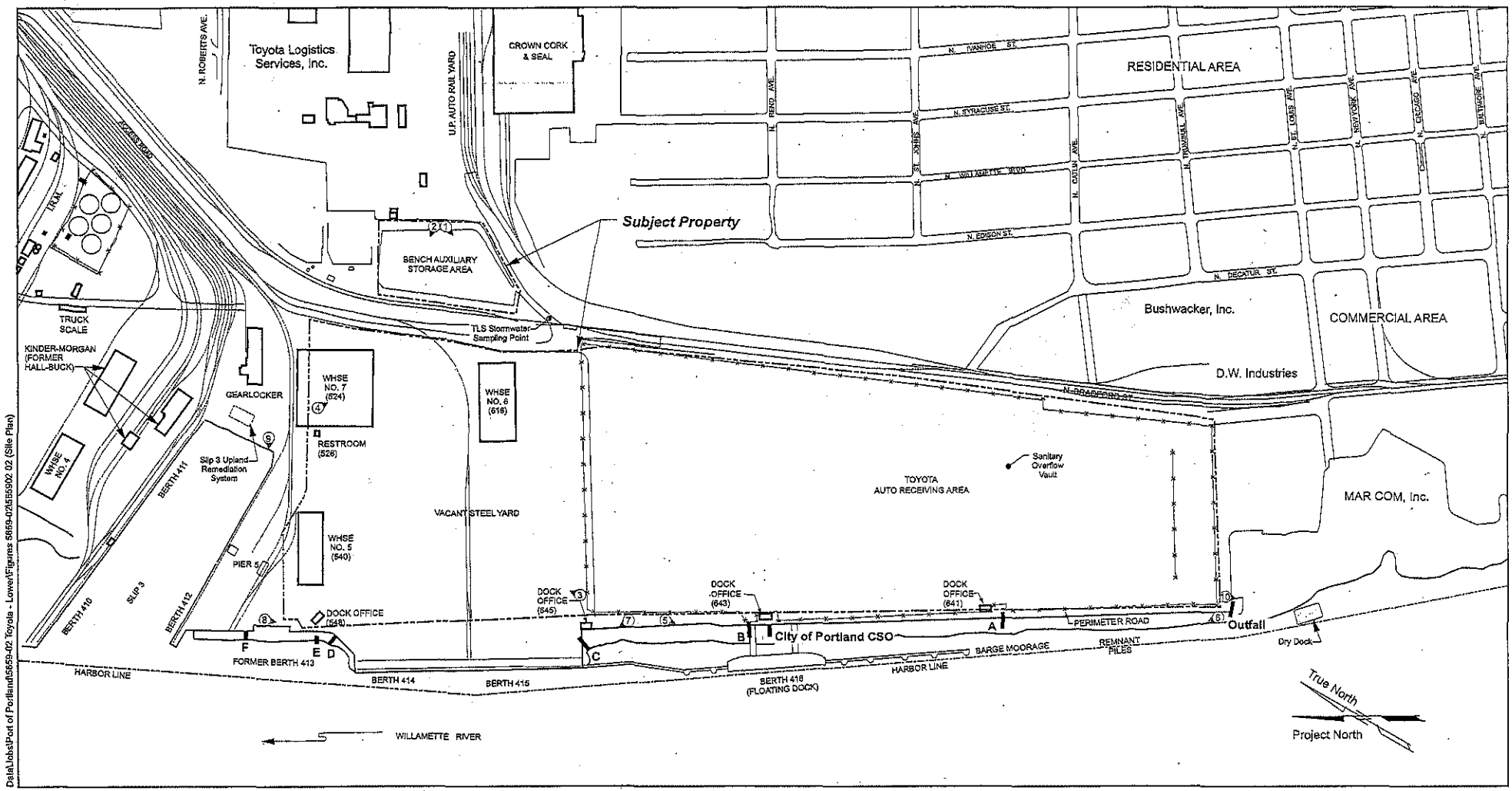
5659-02 *7/02*

Figure 1

Site Plan
Toyota Logistics Services, Inc. - Lower Parcel
Port of Portland - Terminal 4, Portland, Oregon



Data:Jobs:Port of Portland\5659-02 Toyota - Lower\Figures 5659-02\5659-02 (Site Plan)

Note: Base map prepared from a Terminal 4 site plan provided by the Port of Portland.

Legend:

- Fence
- Railroad Tracks
- B — Stormwater Outfall and Designation
- DOCK OFFICE (645) — Building and Terminal 4 Address
- Photograph Location, Direction, and Number

0 400 800
Approximate Scale in Feet

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Figure 2